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February 7, 1994

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BY HAND

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222 -- Mail Stop 1170  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Communication in  
PR Docket No. 93-61

Dear Mr. Caton:

On February 1, 1994, representatives of Southwestern Bell Mobile Systems, Inc. ("SBMS") met with Commission staff members from the Private Radio Bureau, the Office of Engineering and Technology and the Office of Commissioner Andrew Barrett to discuss an interim report prepared by the Mobile and Portable Radio Research Group ("MPRG") of Virginia Tech. During their meetings, the representatives also presented the LMS band frequency allocation model that SBMS originally proposed in this proceeding, revised to accomodate existing licensees. An outline of SBMS' current allocation proposal and a revised spectrum allocation chart were provided with SBMS' three notices of ex parte communication filed with your office on February 2, 1994.

SBMS has now learned that the Commission intends to notice for comment a number of recent presentations made in the referenced proceeding by various parties, including SBMS. In order to encourage full debate on SBMS' revised LMS band spectrum allocation proposal, SBMS hereby provides an updated frequency allocation chart which depicts not only SBMS' revised LMS spectrum allocation proposal, but also the present interim AVM allocation and the location in the band of some other existing wide band AVM/LMS licensees.

The revisions to SBMS' original spectrum proposal are relatively minor. Originally, SBMS proposed to allocate discrete spectrum to both narrow band and wide band LMS systems to eliminate potential electrical interference between such carriers. SBMS further advocated the licensing of multiple wide band LMS providers by allocating at least four exclusive (with

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respect to other wide band and narrow band LMS operators) 4 MHz wide band assignments in each market area within, respectively, the 904-908 MHz (Wide Band A), 908-912 MHz (Wide Band B), 918-922 MHz (Wide Band C) and 922-926 MHz (Wide Band D) bands. To encourage spectrum efficiency, SBMS also advocated the assignment of separate spectrum for 250 KHz forward link frequencies associated with wide band operations outside the 16 MHz of wide band assignments and to the edges of the entire 26 MHz LMS band. As an alternative next-best forward link proposal, SBMS suggested that each wide band operator's forward links be located within its exclusive 4 MHz assignment.

In view of comments filed by parties in this proceeding, and based on additional research, SBMS now proposes to shift the four exclusive 4 MHz wide band assignments by two megahertz, resulting in wide band LMS assignments at 906-910 MHz (Wide Band A), 910-914 MHz (Wide Band B), 916-920 MHz (Wide Band C) and 920-924 MHz (Wide Band D). The revised wide band assignments will avoid the need for several present wide band licensees, including PacTel Teletrac (center wide band frequency at 908 MHz), MobileVision (center wide band frequency at 922 MHz) and Pinpoint Communications, Inc. (also center wide band frequency at 922 MHz), to modify their present wide band license assignments. SBMS continues to advocate its preferred option to locate the 250 KHz forward links of each licensee in separate spectrum at the band edges. The modified proposal also would affect the width of the frequency bands allocated to narrowband operators, but would not change the total spectrum SBMS proposes to devote to those services.

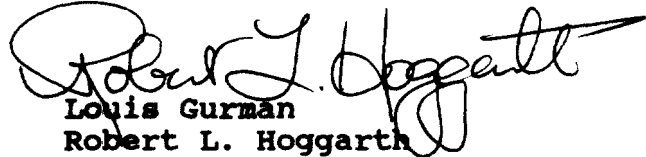
The revised chart only depicts SBMS' proposed changes to its original LMS spectrum allocation proposal as it relates to the division of spectrum. SBMS believes that its AVM/LMS system should be able to coexist with primary users of the 902-928 MHz band and with Part 15 products that currently occupy the band. SBMS intends to take full advantage of the anticipated opportunity to file comments regarding the presentations made by other parties in this proceeding when it is provided by the Commission.

Pursuant to Section 1.1206(a)(1) of the FCC's rules, two copies of the revised chart and this transmittal letter are being filed with your office. Various copies of this package are being

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circulated to Commission staff members. Please contact this office if you have any questions regarding this matter.

Very truly yours,

  
Louis Gurman  
Robert L. Hoggarth

Enclosure

cc (w/encl.): Rosalind K. Allen  
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## Recommended Spectrum Allocation

